

## **REMARKS**

Applicants respectfully request entry of the following amendments and remarks contained herein in response to the final Office Action mailed February 6, 2007. Applicants respectfully submit that the amendment and remarks contained herein place the instant application in condition for allowance.

Upon entry of the amendments in this response, claims 1 – 23 are pending. In particular, Applicants amend claims 1 and 9 – 17. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

### **I. Examiner Interview**

Applicants first wish to express their sincere appreciation for the time that Examiners Huynh and Osberg spent with Applicants' Attorney, Anthony Bonner, during a telephone discussion on April 6, 2007 regarding the outstanding Office Action. During that conversation, Mr. Bonner and the Examiners discussed potential arguments and amendments for claim 1 in view of *Hackbarth*. The general thrust of the potential principal arguments included a discussion that *Hackbarth* does not appear to disclose an email interface, as recited in claim 1. Additionally, the Examiners seemed to indicate that it would be potentially beneficial for Applicants to make amendments contained herein. Thus, Applicants respectfully request that Examiner Carleton carefully consider this response and the amendments.

### **II. Rejections Under 35 U.S.C. §101**

The Office Action indicates that claims 9 – 15 stand rejected under 35 U.S.C. §101 allegedly because claims 9 – 15 are allegedly directed to non-statutory subject matter. Applicants amend claims 9 – 15, as indicated above. Applicants submit that these amendments comply with the Office Action's request and that claims 9 – 15, as amended, are allowable in view of 35 U.S.C. §101.

### III. Rejections Under 35 U.S.C. §103

#### A. Claim 1 is Allowable Over *Lehman* in view of *Bezos* and further in view of *Hackbarth*

The Office Action indicates that claim 1 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over publication Wayback machine:

<http://web.archive.org/web/19970125101157/http://www.albion.com/ngmsn/07chat-sample.html> ("*Lehman*") in view of U.S. Patent Number 6,525,747 ("*Bezos*") and further in view of U.S. Publication Number 2002/0143877 ("*Hackbarth*"). Applicants respectfully traverse this rejection for at least the reason that *Lehman* in view of *Bezos* and further in view of *Hackbarth* fails to disclose, teach, or suggest all of the elements of claim 1. More specifically, claim 1 recites:

A method for saving a transcript of instant messaging (IM) chat sessions, the method comprising:

***providing an email compose interface*** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including an ***IM launch option for launching an IM chat session with the at least one recipient of the email message;***

***receiving an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface;***

receiving an indication to save an IM chat transcript of the IM chat session; and

saving the IM chat transcript in response to receiving the indication to save the IM chat transcript. (***emphasis added***)

Applicants respectfully submit that claim 1, as amended, is allowable over the cited art for at least the reason that *Lehman* fails to disclose, teach, or suggest a "method for saving a transcript of instant messaging (IM) chat sessions, the method comprising... ***providing an email compose interface*** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose

interface including ***an IM launch option for launching an IM chat session with the at least one recipient of the email message... [and] receiving an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface***" as recited in claim 1, as amended. More specifically, *Lehman* discloses a "chat room (page 2, line 8)... [configured to] save and print out a transcript of a chat" (page 9, line 24). Applicants respectfully submit that this is different than ***"providing an email compose interface*** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including ***an IM launch option for launching an IM chat session with the at least one recipient of the email message... [and] receiving an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface***" as recited in claim 1, as amended. For at least this reason, claim 1, as amended, is allowable over the cited art.

Additionally, *Bezos* fails to overcome the deficiencies of *Lehman*. More specifically, *Bezos* discloses a system configured to "coordinate the dissemination of comments from those who receive... information" (column 4, line 26). Applicants respectfully submit that this is different than ***"providing an email compose interface*** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including ***an IM launch option for launching an IM chat session with the at least one recipient of the email message... [and] receiving an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface***" as recited in claim 1, as amended. For at least this reason, claim 1, as amended, is allowable over the cited art.

Applicants further submit that *Hackbarth* fails to overcome the deficiencies of *Lehman* and *Bezos*. More specifically, *Hackbarth* discloses a "Java List view with several columns. Each row 811 corresponds to information for exactly one person" (page 9, paragraph [0233] and FIG. 8). As illustrated in FIG. 8, *Hackbarth* discloses a list of a plurality of users and various contact data related to the users. Nowhere in FIG. 8 is there indicated an "email composer interface." Additionally, nowhere in this drawing, or elsewhere does *Hackbarth* appear to disclose an "IM launch option" as recited in claim 1, as amended. For at least this reason, claim 1, as amended, is allowable over the cited art.

**B. Claim 9 is Allowable Over *Lehman* in view of *Bezos* and further in view of *Hackbarth***

The Office Action indicates that claim 9 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over publication *Lehman* in view of *Bezos* and further in view of *Hackbarth*. Applicants respectfully traverse this rejection for at least the reason that *Lehman* in view of *Bezos* and further in view of *Hackbarth* fails to disclose, teach, or suggest all of the elements of claim 9. More specifically, claim 9 recites:

A computer-readable storage medium encoded with instructions for execution, comprising:

computer-readable code adapted to instruct a programmable device to ***provide an email compose interface*** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including ***an IM launch option for launching an IM chat session with the at least one recipient of the email message;***

***computer-readable code adapted to instruct a programmable device to receive an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface;***

computer-readable code adapted to instruct a programmable device to receive an indication to save an IM chat transcript of the IM chat session; and

computer-readable code adapted to instruct a programmable device to save the IM chat transcript in response to receiving the indication to save the IM chat transcript. (***emphasis added***)

Applicants respectfully submit that claim 9, as amended, is allowable over the cited art for at least the reason that *Lehman* fails to disclose, teach, or suggest a “computer-readable storage medium encoded with instructions for execution, comprising... computer-readable code adapted to instruct a programmable device to **provide an email compose interface** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including **an IM launch option for launching an IM chat session with the at least one recipient of the email message...** [and] **computer-readable code adapted to instruct a programmable device to receive an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface**” as recited in claim 9, as amended. More specifically, *Lehman* discloses a “chat room (page 2, line 8)... [configured to] save and print out a transcript of a chat” (page 9, line 24). Applicants respectfully submit that this is different than “computer-readable code adapted to instruct a programmable device to **provide an email compose interface** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including **an IM launch option for launching an IM chat session with the at least one recipient of the email message...** [and] **computer-readable code adapted to instruct a programmable device to receive an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface**” as recited in claim 9, as amended. For at least this reason, claim 9, as amended, is allowable over the cited art.

Additionally, *Bezos* fails to overcome the deficiencies of *Lehman*. More specifically, *Bezos* discloses a system configured to “coordinate the dissemination of comments from those who receive... information” (column 4, line 26). Applicants respectfully submit that this is

different than “computer-readable code adapted to instruct a programmable device to **provide an email compose interface** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including **an IM launch option for launching an IM chat session with the at least one recipient of the email message...** [and] **computer-readable code adapted to instruct a programmable device to receive an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface**” as recited in claim 9, as amended. For at least this reason, claim 9, as amended, is allowable over the cited art.

Applicants further submit that *Hackbarth* fails to overcome the deficiencies of *Lehman* and *Bezos*. More specifically, *Hackbarth* discloses a “Java List view with several columns. Each row 811 corresponds to information for exactly one person” (page 9, paragraph [0233] and FIG. 8). As illustrated in FIG. 8, *Hackbarth* discloses a list of a plurality of users and various contact data related to the users. Nowhere in FIG. 8 is there indicated an “email composer interface.” Additionally, nowhere in this drawing, or elsewhere does *Hackbarth* appear to disclose an “IM launch option” as recited in claim 9, as amended. For at least this reason, claim 9, as amended, is allowable over the cited art.

**C. Claim 16 is Allowable Over *Lehman* in view of *Bezos* and further in view of *Hackbarth***

The Office Action indicates that claim 16 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over publication *Lehman* in view of *Bezos* and further in view of *Hackbarth*. Applicants respectfully traverse this rejection for at least the reason that *Lehman* in view of *Bezos* and further in view of *Hackbarth* fails to disclose, teach, or suggest all of the elements of claim 16. More specifically, claim 16 recites:

A system for saving a transcript of instant messaging (IM) chat sessions, the system comprising:

means for providing an **email compose interface** for composing an email message, the email interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including **an IM launch option for launching an IM chat session with the at least one recipient of the email message;**

**means for receiving an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface;**

means for receiving an indication to save an IM chat transcript of the IM chat session; and

means for saving the IM chat transcript in response to receiving the indication to save the IM chat transcript. (**emphasis added**)

Applicants respectfully submit that claim 16, as amended, is allowable over the cited art for at least the reason that *Lehman* fails to disclose, teach, or suggest a “system for saving a transcript of instant messaging (IM) chat sessions, the system comprising... means for providing an **email compose interface** for composing an email message, the email interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including **an IM launch option for launching an IM chat session with the at least one recipient of the email message...** [and] **means for receiving an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface**” as recited in claim 16, as amended. More specifically, *Lehman* discloses a “chat room (page 2, line 8)... [configured to] save and print out a transcript of a chat” (page 9, line 24). Applicants respectfully submit that this is different than “means for providing an **email compose interface** for composing an email message, the email interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including **an IM launch option for launching an IM chat session with the at least one**

***recipient of the email message... [and] means for receiving an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface***” as recited in claim 16, as amended. For at least this reason, claim 16, as amended, is allowable over the cited art.

Additionally, *Bezos* fails to overcome the deficiencies of *Lehman*. More specifically, *Bezos* discloses a system configured to “coordinate the dissemination of comments from those who receive... information” (column 4, line 26). Applicants respectfully submit that this is different than “means for providing an ***email compose interface*** for composing an email message, the email interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including ***an IM launch option for launching an IM chat session with the at least one recipient of the email message... [and] means for receiving an indication to launch an IM chat session with the at least one email recipient of the email message from the email compose interface***” as recited in claim 16, as amended. For at least this reason, claim 16, as amended, is allowable over the cited art.

Applicants further submit that *Hackbarth* fails to overcome the deficiencies of *Lehman* and *Bezos*. More specifically, *Hackbarth* discloses a “Java List view with several columns. Each row 811 corresponds to information for exactly one person” (page 9, paragraph [0233] and FIG. 8). As illustrated in FIG. 8, *Hackbarth* discloses a list of a plurality of users and various contact data related to the users. Nowhere in FIG. 8 is there indicated an “email composer interface.” Additionally, nowhere in this drawing, or elsewhere does *Hackbarth* appear to disclose an “IM launch option” as recited in claim 16, as amended. For at least this reason, claim 16, as amended, is allowable over the cited art.

**D. Claim 17 is Allowable Over *Lehman* in view of *Bezos* and further in view of *Hackbarth***



The Office Action indicates that claim 17 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over publication *Lehman* in view of *Bezos* and further in view of *Hackbarth*. Applicants respectfully traverse this rejection for at least the reason that *Lehman* in view of *Bezos* and further in view of *Hackbarth* fails to disclose, teach, or suggest all of the elements of claim 17. More specifically, claim 17 recites:

A system for saving a transcript of instant messaging (IM) chat sessions, the system comprising:

a provide component configured to ***provide an email compose interface*** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including ***an IM launch option for launching an IM chat session with the at least one recipient of the email message***;

a first receive component configured to receive an indication to launch an IM chat session with the at least one recipient of the email message from the email compose interface;

a second receive component configured to receive an indication to save an IM chat transcript of the IM chat session; and

a save component configured to save the IM chat transcript in response to receiving the indication to save the IM chat transcript. ***(emphasis added)***

Applicants respectfully submit that claim 17, as amended, is allowable over the cited art for at least the reason that *Lehman* fails to disclose, teach, or suggest a "system for saving a transcript of instant messaging (IM) chat sessions, the system comprising... a provide component configured to ***provide an email compose interface*** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including ***an IM launch option for launching an IM chat session with the at least one recipient of the email message***... [and] a ***first receive component configured to receive an indication to launch an IM chat session with the at least one recipient of the email message from the email compose interface***" as recited in claim 17, as amended. More specifically, *Lehman* discloses a "chat room (page 2, line 8)...

[configured to] save and print out a transcript of a chat" (page 9, line 24). Applicants respectfully submit that this is different than "a provide component configured to **provide an email compose interface** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including **an IM launch option for launching an IM chat session with the at least one recipient of the email message...** [and] **a first receive component configured to receive an indication to launch an IM chat session with the at least one recipient of the email message from the email compose interface**" as recited in claim 17, as amended. For at least this reason, claim 17, as amended, is allowable over the cited art.

Additionally, *Bezos* fails to overcome the deficiencies of *Lehman*. More specifically, *Bezos* discloses a system configured to "coordinate the dissemination of comments from those who receive... information" (column 4, line 26). Applicants respectfully submit that this is different than "a provide component configured to **provide an email compose interface** for composing an email message, the email compose interface configured to designate at least one email recipient, the email compose interface including an email send option for sending the email message to the email recipient, the email compose interface including **an IM launch option for launching an IM chat session with the at least one recipient of the email message...** [and] **a first receive component configured to receive an indication to launch an IM chat session with the at least one recipient of the email message from the email compose interface**" as recited in claim 17, as amended. For at least this reason, claim 17, as amended, is allowable over the cited art.

Applicants further submit that *Hackbarth* fails to overcome the deficiencies of *Lehman* and *Bezos*. More specifically, *Hackbarth* discloses a "Java List view with several columns. Each row 811 corresponds to information for exactly one person" (page 9, paragraph [0233] and FIG. 8). As illustrated in FIG. 8, *Hackbarth* discloses a list of a plurality of users and various

contact data related to the users. Nowhere in FIG. 8 is there indicated an “email composer interface.” Additionally, nowhere in this drawing, or elsewhere does *Hackbarth* appear to disclose an “IM launch option” as recited in claim 17, as amended. For at least this reason, claim 17, as amended, is allowable over the cited art.

**E. Claims 2, 7, 10, 14, 18, and 22 are Allowable Over *Lehman* in view of *Bezos* and further in view of *Hackbarth***

The Office Action indicates that claims 2, 7, 10, 14, 18 and 22 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over *Lehman* in view of *Bezos* and further in view of *Hackbarth*. Applicants respectfully traverse this rejection for at least the reason that *Lehman* in view of *Bezos* and further in view of *Hackbarth* fails to disclose, teach, or suggest all of the elements of claims 2, 7, 10, 14, 18 and 22. More specifically, dependent claims 2, 7, and 8 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 1. Dependent claims 10 and 14 are believed to be allowable for at least the reason that they depend from allowable independent claim 9. Dependent claims 18 and 22 are believed to be allowable for at least the reason that they depend from allowable independent claim 17. *In re Fine, Minnesota Mining and Mfg. Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

**F. Claims 3 – 5, 11 – 12, and 19 – 20 are Allowable Over *Lehman* in view of *Bezos* and *Hackbarth* and further in view of *Kusuda***

The Office Action indicates that claims 3 – 5, 11 – 12, and 19 – 20 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over *Lehman* in view of *Bezos* and *Hackbarth* and further in view of U.S. Publication Number 2003/0088623 (“*Kusuda*”). Applicants respectfully traverse this rejection for at least the reason that *Lehman* in view of *Bezos* and *Hackbarth* and further in view of *Kusuda* fails to disclose, teach, or suggest all of the elements of claims 3 – 5, 11 – 12, and 19 – 20. More specifically, dependent claims 3 – 5 are believed to

be allowable for at least the reason that these claims depend from allowable independent claim

1. Dependent claims 11 and 12 are believed to be allowable for at least the reason that they depend from allowable independent claim 9. Dependent claims 19 and 20 are believed to be allowable for at least the reason that they depend from allowable independent claim 17. *In re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

**G. Claims 6, 13, and 21 are Allowable Over *Lehman* in view of *Bezos* and *Hackbarth* and *Kusuda* and further in view of *Gusler***

The Office Action indicates that claims 6, 13, and 21 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over *Lehman* in view of *Bezos* and *Hackbarth* and *Kusuda* and further in view of U.S. Publication Number 2003/0105815 ("*Gusler*"). Applicants respectfully traverse this rejection for at least the reason that *Lehman* in view of *Bezos* and *Hackbarth* and *Kusuda* and further in view of *Gusler* fails to disclose, teach, or suggest all of the elements of claims 6, 13, and 21. More specifically, dependent claim 6 is believed to be allowable for at least the reason that this claim depends from allowable independent claim 1. Dependent claim 13 is believed to be allowable for at least the reason that this claim depends from allowable independent claim 9. Dependent claim 21 is believed to be allowable for at least the reason that this claim depends from allowable independent claim 17. *In re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

**H. Claims 8, 15, and 23 are Allowable Over *Lehman* in view of *Bezos* and *Hackbarth* and further in view of *Gusler***

The Office Action indicates that claims 8, 15, and 23 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over *Lehman* in view of *Bezos* and *Hackbarth* and further in view of *Gusler*. Applicants respectfully traverse this rejection for at least the reason that *Lehman* in view of *Bezos* and *Hackbarth* and further in view of *Gusler* fails to disclose, teach, or suggest all of the elements of claims 8, 15, and 23. More specifically, dependent

claim 8 is believed to be allowable for at least the reason that this claim depends from allowable independent claim 1. Dependent claim 13 is believed to be allowable for at least the reason that this claim depends from allowable independent claim 9. Dependent claim 23 is believed to be allowable for at least the reason that this claim depends from allowable independent claim 17. *In re Fine, Minnesota Mining and Mfg. Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

#### **IV. Alleged Inherent Subject Matter**

##### **A. The Subject Matter of Claims 2, 10, and 18 is Not Inherent**

In addition, in rejecting claims 2, 10, and 18, the Office Action asserts that *Lehman* “inherently teaches” (OA page 8, last paragraph) the elements of claims 2, 10, and 18. Applicants respectfully traverse the finding of inherency. It is well established that “[t]o establish inherency, the extrinsic evidence must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. Inherency, however, may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient.” *In Re Anthony J. Robertson*, 169 F.3d 743, 745, 49 U.S.P.Q.2D (BNA) 1949, 1950-51 (Fed. Cir. 1999).

Applicants respectfully submit that the Office Action fails to adequately establish that the subject matter of claims 2, 10, and 18 is necessarily present. As the Office Action fails to provide any extrinsic evidence that makes clear that the missing descriptive matter is necessarily present, Applicants respectfully submit that inherency has not been established. In accordance with *In re Robertson*, Applicants traverse the inherency finding, and submit that claims 2, 10, and 18 are allowable over the cited art.

##### **B. The Subject Matter of Claims 6, 13, and 21 is Not Inherent**

In addition, in rejecting claims 6, 13, and 21, the Office Action asserts that “converting the IM chat transcript to an email message is inherent by having the ability to provide the transcripts in a variety of different ways” (OA page 10, last paragraph). Applicants respectfully traverse the finding of inherency. It is well established that “[t]o establish inherency, the extrinsic evidence must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. Inherency, however, may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient.” *In Re Anthony J. Robertson*, 169 F.3d 743, 745, 49 U.S.P.Q.2D (BNA) 1949, 1950-51 (Fed. Cir. 1999).

Applicants respectfully submit that the Office Action fails to adequately establish that the subject matter of claims 6, 13, and 21 is necessarily present. As the Office Action fails to provide any extrinsic evidence that makes clear that the missing descriptive matter is necessarily present, Applicants respectfully submit that inherency has not been established. In accordance with *In re Robertson*, Applicants traverse the inherency finding, and submit that claims 6, 13, and 21 are allowable over the cited art.

**C. The Subject Matter of Claims 8, 15, and 23 is Not Inherent**

In addition, in rejecting claims 8, 15, and 23, the Office Action asserts that “saving the IM chat transcript as an email message is inherently a step prior to sending an email message to a recipient” (OA page 11, third full paragraph). Applicants respectfully traverse the finding of inherency. It is well established that “[t]o establish inherency, the extrinsic evidence must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. Inherency, however, may not be established by probabilities or possibilities. The mere fact that a certain thing may

result from a given set of circumstances is not sufficient." *In Re Anthony J. Robertson*, 169 F.3d 743, 745, 49 U.S.P.Q.2D (BNA) 1949, 1950-51 (Fed. Cir. 1999).

Applicants respectfully submit that the Office Action fails to adequately establish that the subject matter of claims 8, 15, and 23 is necessarily present. As the Office Action fails to provide any extrinsic evidence that makes clear that the missing descriptive matter is necessarily present, Applicants respectfully submit that inherency has not been established. In accordance with *In re Robertson*, Applicants traverse the inherency finding, and submit that claims 8, 15, and 23 are allowable over the cited art.

## CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested.

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and Official Notice, or statements interpreted similarly, should not be considered well-known for the particular and specific reasons that the claimed combinations are too complex to support such conclusions and because the Office Action does not include specific findings predicated on sound technical and scientific reasoning to support such conclusions.

If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

/afb/

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